

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Alan Napoli,

Plaintiff,

-against-

Deluxe Corporation and Deluxe Small Business
Sales, Inc.

Defendants.

Civil Action No.: 17-cv-6957(SJF)

**DECLARATION OF
JASON J. OLIVERI**

JASON J. OLIVERI, an attorney duly admitted to practice before this Court declares the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an associate in the law firm of Hinshaw & Culbertson LLP, attorneys for defendants, Deluxe Corporation (“Deluxe Corp.”) and Deluxe Small Business Sales, Inc. (“Deluxe SBS”) (collectively, “Deluxe” or “Defendants”), and as such, I am fully familiar with the facts and circumstances of this matter.

2. A true and correct copy of the Summons and Verified Complaint (“Complaint”), dated November 29, 2017, filed by plaintiff Alan Napoli (“Napoli” or “Plaintiff”) against Defendants is annexed hereto as **Exhibit A**.

3. A true and correct copy of Defendants’ Verified Answer with Affirmative Defenses and Counterclaims (“Answer”), dated May 18, 2018, filed in response to the Complaint is annexed hereto as **Exhibit B**.

WHEREFORE, it is respectfully requested that the Court grant Defendants' motion to dismiss the Complaint.

Dated: New York, New York
May 18, 2018

s/Jason J. Oliveri
Jason J. Oliveri